

EXHIBIT B: COURTS GRANTING COMPASSIONATE RELEASE IN LIGHT OF COVID-19

Authority	
1.	<i>United States v. Jackson</i> , No. 4:14-CR-00576, 2020 WL 1955402, at *4 (S.D. Tex. Apr. 23, 2020) (granting compassionate release in light of defendant’s “high vulnerability to COVID-19”).
2.	<i>United States v. Bess</i> , No. 16-cr-156, 2020 WL 1940809 (W.D.N.Y. Apr. 22, 2020) (“[T]he grave risks that COVID-19 poses to individuals with the defendant’s medical conditions, combined with the increased risk inmates face of contracting the disease at Butner” warrant compassionate release.).
3.	<i>United States v. Curtis</i> , No. 03-533 (BAH), 2020 WL 1935543, at *5 (D.D.C. Apr. 22, 2020) (granting compassionate release in light of “the spread of COVID-19 in BOP facilities” and “defendant’s particular susceptibility to the worst effects of that virus”).
4.	<i>United States v. Poullos</i> , No. 2:09-cr-00109-RAJ-TEM, 2020 WL 1922775, at *3 (E.D. Va. Apr. 21, 2020) (granting compassionate release “because of the great risk that COVID-19 poses to a person of [defendant’s] age with underlying health conditions”).
5.	<i>United States v. Love</i> , No. 1:14-cr-4-1, Dkt. No. 41 (W.D. Mich. Apr. 21, 2020) (granting compassionate release due to defendant’s “higher risk of falling severely ill from Covid-19”).
6.	<i>United States v. Scparta</i> , No. 18-cr-578 (AJN), 2020 WL 1910481, at *9 (S.D.N.Y. Apr. 20, 2020) (granting compassionate release to defendant with “multiple medical issues that make him especially vulnerable to complications from COVID-19”).
7.	<i>United States v. Atwi</i> , No. 18-20607, 2020 WL 1910152, at *5 (E.D. Mich. Apr. 20, 2020) (granting compassionate release in light of defendant’s tuberculosis diagnosis “and the serious dangers caused by the spread of COVID-19 in prison facilities”).
8.	<i>United States v. Gileno</i> , No. 3:19-cr-161-(VAB)-1, 2020 WL 1916773, at *5 (D. Conn. Apr. 20, 2020) (granting compassionate release due to defendant’s “asthma and respiratory conditions that place him at greater risk from COVID-19”).
9.	<i>United States v. Razzouk</i> , No. 11-CR-430 (ARR), Dkt. No. 136 (E.D.N.Y. Apr. 19, 2020) (granting compassionate release because defendant’s “age and medical condition make him especially vulnerable to COVID-19 because he risks developing severe complications from the disease”).
10.	<i>United States v. Joling</i> , No. 6:11-cr-60131-AA, 2020 WL 1903280, at *5 (D. Or. Apr. 17, 2020) (granting compassionate release “because defendant has shown that he is individually at high-risk for severe illness from COVID-19 and because inmates in detention facilities are particularly vulnerable to infection”).
11.	<i>United States v. Atkinson</i> , No. 2:19-CR-55-JC (CWH), 2020 WL 1904585, at *4 (D. Nev. Apr. 17, 2020) (granting compassionate release to defendant who “indisputably has a preexisting medical condition that makes him particularly susceptible to COVID-19”).
12.	<i>United States v. Asaro</i> , 17-cr-127 (ARR), 2020 WL 1899221, at *6 (E.D.N.Y. Apr. 17, 2020) (“[T]he combination of the COVID-19 health crisis and Asaro’s age and pre-existing conditions constitutes an extraordinary and compelling reason for his release.”).

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13.	<i>United States v. Minor</i> , No. 18-cr-80152, Dkt. No. 34 (S.D. Fla. Apr. 17, 2020) (granting compassionate release because “Defendant’s serious and substantial preexisting medical issues, combined with his age, place him at increased risk of severe illness if he contracts COVID-19”).
14.	<i>Samy v. United States</i> , No. 16-20610-1, 2020 WL 1888842, at *3 (E.D. Mich. Apr. 16, 2020) (granting compassionate release in light of defendant’s “serious medical conditions” and her “heightened vulnerability” to COVID-19 in prison).
15.	<i>United States v. Hammond</i> , No. 02-294 (BAH), 2020 WL 1891980, at *9 (D.D.C. Apr. 16, 2020) (“The defendant’s age, amount of time he has already served, and deteriorated health, along with his particular need to avoid exposure to the current worldwide pandemic convincingly show that extraordinary and compelling reasons warrant” compassionate release.) (quotation omitted).
16.	<i>United States v. Norris</i> , No. 17-cr-106 (SRU), Dkt. No. 119 (D. Conn. Apr. 16, 2020) (In light of COVID-19, defendant’s asthma and “current conditions of confinement constitute extraordinary and compelling reasons to reduce his sentence.”).
17.	<i>United States v. Cosgrove</i> , Case No. 15-cr-230-RSM, 2020 WL 1875509, at *4 (W.D. Wash. Apr. 15, 2020) (granting compassionate release in light of “new evidence regarding the evolving COVID-19 health crisis”).
18.	<i>United States v. Coker</i> , 3:14-CR-085, 2020 WL 1877800, at *6 (E.D. Tenn. Apr. 15, 2020) (granting compassionate release “in light of the defendant’s serious medical conditions” and COVID-19).
19.	<i>United States v. MacFarlane</i> , No. 19-10131-NMG, 2020 WL 1866311 (D. Mass. Apr. 14, 2020) (granting compassionate release in light of COVID-19 pandemic).
20.	<i>United States v. McPherson</i> , Case No. 3:94-cr-5708, 2020 WL 1862596 (W.D. Wash. Apr. 14, 2020) (granting compassionate release to defendant “at risk of COVID-19”).
21.	<i>United States v. Kataev</i> , 16 Cr. 763-05 (LGS), 2020 WL 1862685, at *3 (S.D.N.Y. Apr. 14, 2020) (“Defendant’s unique health and family circumstances together, and in light of the COVID-19 public health crisis, constitute ‘extraordinary and compelling reasons’ to modify Defendant’s sentence.”).
22.	<i>United States v. Gross</i> , 15-cr-769 (AJN), 2020 WL 1862251, at *2 (S.D.N.Y. Apr. 14, 2020) (“It is now nearly beyond cavil that the combination of the COVID-19 pandemic and Mr. Gross’s health conditions constitutes an extraordinary and compelling reason warranting a reduction of his sentence.”).
23.	<i>United States v. Ben-Yhwh</i> , No. 1:15-cr-830-LEK, 2020 WL 1874125 (D. Haw. Apr. 13, 2020) (Defendant’s serious medical conditions “combined with the COVID-19 crisis constitute an extraordinary and compelling reason to modify his sentence.”).
24.	<i>United States v. Smith</i> , No. 12 Cr. 133 (JFK), 2020 WL 1849748 (S.D.N.Y. Apr. 13, 2020) (granting compassionate release to 62-year-old with asthma and high cholesterol with 22 months remaining of 120-month sentence).

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25.	<i>United States v. Wen</i> , 6:17-CR-06173 EAW, 2020 WL1845104 (W.D.N.Y. Apr. 13, 2020) (granting compassionate release to 48-year-old defendant with asthma).
26.	<i>United States v. Sawicz</i> , 08-cr-287 (ARR), 2020 WL 1815851 (E.D.N.Y. Apr. 10, 2020) (granting compassionate release to defendant with hypertension in light of COVID-19).
27.	<i>United States v. Knox</i> , No. 15 Cr. 445 (PAE), Dkt. No. 1088 (S.D.N.Y. Apr. 10, 2020) (granting compassionate release to defendant at “heightened danger” from COVID-19).
28.	<i>United States v. Tran</i> , CR 08-00197-DOC, 2020 WL 1820520 (C.D. Cal. Apr. 10, 2020) (granting compassionate release to defendant with asthma in light of COVID-19).
29.	<i>United States v. Burrill</i> , No. 17-cr-00491-RS-1, 2020 WL 1846788, at *3 (N.D. Cal. Apr. 10, 2020) (granting compassionate release in light of the “particular risk COVID-19 poses to older individuals and those who suffer from [defendant’s] medical conditions”).
30.	<i>Miller v. United States</i> , No. 16-20222-1, 2020 WL 1814084, at *4 (E.D. Mich. Apr. 9, 2020) (“Continuing [defendant’s] incarceration under the current circumstances could be a lethal decision. Therefore, the Court finds that extraordinary and compelling reasons exist for his immediate compassionate release.”).
31.	<i>United States v. Trent</i> , No. 16-cr-00178-CRB-1, 2020 WL 1812242, at *2 (N.D. Cal. Apr. 9, 2020) (“The Court finds that in the context of the COVID-19 pandemic, these medical conditions [including diabetes and obesity], which render [defendant] uniquely vulnerable to serious illness if he contracts COVID-19, substantially diminish his ability to provide self-care within the environment of a correctional facility.”) (citation omitted).
32.	<i>United States v. Henao</i> , 10-cr-231 (ENV), 2020 WL 1812447, at *1 (E.D.N.Y. Apr. 9, 2020) (granting compassionate release due to defendant’s “health issues, elevated risk of dire health consequences due to the current COVID-19 outbreak, and status as a non-violent offender”).
33.	<i>United States v. Hansen</i> , 07-CR-00520(KAM), 2020 WL 1703672 (E.D.N.Y. Apr. 8, 2020) (granting compassionate release even where no “inmates or personnel at [defendant’s] current facility have been diagnosed with the COVID-19 virus”).
34.	<i>United States v. McCarthy</i> , No. 3:17-CR-0230, 2020 WL 1698732, at *4 (D. Conn. Apr. 8, 2020) (granting compassionate release to 65-year-old defendant suffering from “COPD, asthma, and other lung-related ailments” that “substantially increase [defendant’s] risk of severe illness if he contracts COVID-19”).
35.	<i>United States v. Jasper</i> , 18 CR 390-18 (PAE), Dkt. No. 441 (S.D.N.Y. Apr. 6, 2020) (granting compassionate release to defendant with Crohn’s disease in light of “heightened health risks” posed by COVID-19).
36.	<i>United States v. Hakim</i> , CR 05-40025 (D.S.D. Apr. 6, 2020) (granting compassionate release to 48-year-old defendant with chronic kidney disease and hypertension).
37.	<i>United States v. Zukerman</i> , 16 CR 194, 2020 WL 1659880, at *4 (S.D.N.Y. Apr. 3, 2020) (granting compassionate release where, “[a]lthough [defendant’s] original release date may be far off, the threat of COVID-19 is at his doorstep”).

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38.	<i>United States v. Foster</i> , No. 1:14-cr-324-02, Dkt. No. 191 (M.D. Pa. Apr. 3, 2020) (noting the “unprecedented” circumstances facing “our prison system” and finding that COVID-19 is an extraordinary and compelling basis for release; indeed, “[n]o rationale is more compelling or extraordinary”).
39.	<i>United States v. Jones</i> , No. 3:11-cr-249 (E.D. Va. Apr. 3, 2020) (granting compassionate release in light of “the current public health crisis caused by COVID-19”).
40.	<i>United States v. Edwards</i> , No. 6:17-cr-3-NKM, 2020 WL 1650406, at *5 (W.D. Va. Apr. 2, 2020) (granting compassionate release to defendant who “is susceptible to contracting COVID-19” and “at high risk if he contracts it”).
41.	<i>United States v. Resnick</i> , 14 CR 810 (CM), 2020 WL 1651508, at *7 (S.D.N.Y. Apr. 2, 2020) (granting compassionate release due to “(1) the highly infectious nature of COVID-19, (2) the limitations in a prison environment (even a prison medical center) on practicing the hygienic and social distancing techniques that the Center for Disease Control has put in place to prevent rapid transmission, and (3) [defendant’s ailments]”).
42.	<i>United States v. Colvin</i> , No. 19-cr-179, 2020 WL 1613943, at *4 (D. Conn. Apr. 2, 2020) (granting compassionate release for defendant with diabetes, “which substantially increases [defendant’s] risk of severe illness if she contracts COVID-19”).
43.	<i>United States v. Hernandez</i> , No. 18 Cr. 834-04 (PAE), 2020 WL 1684062 (S.D.N.Y. Apr. 2, 2020) (granting compassionate release “in light of the heightened medical risk presented to [defendant] by the COVID-19 pandemic”).
44.	<i>United States v. Hernandez</i> , No. 18-cr-20474, Dkt. No. 41 (S.D. Fla. Apr. 2, 2020) (granting compassionate release for defendant with cancer and immunosuppression and just under 12 months left to serve on 39 month sentence).
45.	<i>United States v. Brannan</i> , No. 4:15-CR-80-01, 2020 WL 1698392 (S.D. Tex. Apr. 2, 2020) (granting compassionate release to 66-year-old defendant with high blood pressure and high cholesterol).
46.	<i>United States v. Perdigao</i> , No. 07-103, 2020 WL 1672322, at *3 (E.D. La. Apr. 2, 2020) (granting compassionate release to defendant with “debilitating bradycardia”).
47.	<i>United States v. Perez</i> , No. 17 CR. 513-3 (AT), 2020 WL 1546422, at *2 (S.D.N.Y. Apr. 1, 2020) (granting compassionate release where “[t]he benefits of keeping [defendant] in prison for the remainder of his sentence are minimal, and the potential consequences of doing so are extraordinarily grave” in light of COVID-19).
48.	<i>United States v. Rodriguez</i> , No. 2:03-cr-00271-AB-1, 2020 WL 1627331, at *1 (E.D. Pa. Apr. 1, 2020) (granting release after finding risk factors for COVID-19 constitute extraordinary and compelling reason and noting that prisons are “tinderboxes for infectious disease”).
49.	<i>United States v. Williams</i> , No. 3:04cr95/MCR, 2020 WL 1751545 (N.D. Fla. Apr. 1, 2020) (granting compassionate release for defendant convicted of armed bank robbery and firearms offenses).

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50.	<i>United States v. Jepsen</i> , No. 3:19-cv-00073(VLB), 2020 WL 1640232, at *5 (D. Conn. Apr. 1, 2020) (granting compassionate release to defendant who “suffers from multiple chronic conditions that are in flux and predispose him to potentially lethal complications if he contracts COVID-19”).
51.	<i>United States v. Gonzalez</i> , No. 2:18-cr-232-TOR, 2020 WL 1536155, at *3 (E.D. Wash. Mar. 31, 2020) (releasing defendant one month into a 10 month sentence in light of medical issues; in normal times defendant’s conditions would be manageable but “[t]hese are not normal times”).
52.	<i>United States v. Dana</i> , 14-CR-405-4 (JMF), Dkt. No. 108 (S.D.N.Y. Mar. 31, 2020) (granting compassionate release in light of COVID-19 pandemic).
53.	<i>United States v. Collins</i> , No. CCB-10-336, 2020 WL 1506176 (D. Md. Mar. 30, 2020) (granting compassionate release to a “non-violent drug offender who has already served a lengthy sentence” even though “it has not been proffered that [defendant] has an underlying health condition which makes him more susceptible to the effects of the virus, and while the risks posed by a defendant’s continued residence in a detention facility do not necessarily mandate release”).
54.	<i>United States v. Marin</i> , No. 15-cr-252, Dkt. No. 1326 (E.D.N.Y. Mar. 30, 2020) (granting compassionate release due to defendant’s “advanced age, significantly deteriorating health, elevated risk of dire health consequences due to the current COVID-19 outbreak, status as a non-violent offender, and service of 80% of his original sentence”).
55.	<i>United States v. Muniz</i> , Case No. 4:09-cr-199, 2020 WL 1540325, at *1 (S.D. Tex. Mar. 30, 2020) (releasing defendant serving 188-month sentence for drug conspiracy in light of vulnerability to COVID- 19, recognizing “individuals housed within our prison systems nonetheless remain particularly vulnerable to infection”).
56.	<i>United States v. Powell</i> , No. 1:94-cr-316-ESH, 2020 WL 1698194, at *1 (D.D.C. Mar. 28, 2020) (granting compassionate release in light of COVID-19).
57.	<i>United States v. Campagna</i> , 16 CR 78-01 (LGS), 2020 WL 1489829, at *2 (S.D.N.Y. Mar. 27, 2020) (“Defendant’s compromised immune system, taken in concert with the COVID-19 public health crisis, constitutes an extraordinary and compelling reason to modify Defendant’s sentence . . .”).
58.	<i>United States v. Copeland</i> , Case No. 2:05-CR-135-DCN (D.S.C. Mar. 24, 2020) (granting compassionate release in part due to “Congress’s desire for courts to release individuals the age defendant is, with the ailments defendant has during this current pandemic”).